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VIA ECF:

The Honorable Nicholas G. Garaufis
United States District Court Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Raniere*, 18 CR 204 (NGG)

Dear Judge Garaufis:

On behalf of the Defendant, I write respectfully to ask this Court to make a recommendation to the Bureau of Prisons that the Defendant remain incarcerated at the Metropolitan Detention Center (“MDC”) as opposed to being transferred to his designated facility, FCI Tucson. Undersigned counsel was only recently retained to represent the Defendant on his direct appeal, and in light of the current public health crisis, she has had no opportunity to meet with him to discuss his pending appeal. In normal times, traveling to confer with Defendant would not prove overly problematic; however, in the current climate, multiple and/or an extended trip to Tucson would be exceedingly burdensome - to speak nothing of the health risks posed to all involved. Given the complexity of this case and the stakes involved, undersigned counsel must have meaningful communication with her client which cannot be accomplished via phone calls. In short, undersigned counsel cannot provide Defendant with the defense to which he is entitled without reasonable access to him, and counsel is hopeful that attorney-client visits at the MDC will resume in short course.

Furthermore, outstanding restitution issues remain in this case. It is critical that the Defendant remain close so that he can assist and participate in his defense as it relates to challenges he may wish to lodge to the Government’s proposed restitution order, currently due on January 27, 2021. Accordingly, Defendant requests that this Court recommend that Defendant remain detained at the MDC at least until he has an opportunity voice an objection to the forthcoming restitution claims and this Court enters a restitution order and/or until Defendant files his opening brief in the Second Circuit, whichever is later.

Respectfully Submitted,

/s/JENNIFER BONJEAN

cc: AUSA Tanya Hajjar (via ECF)